

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

NORTHSTAR AVIATION L.L.C., et al.,

Plaintiffs/Counterclaim Defendants,

v.

ALDEN BURT ALBERTO,

Defendant/Counterclaim Plaintiff.

Case No. 1:18-cv-00191 (TSE/JFA)

DEFENDANT/COUNTERCLAIM PLAINTIFF ALDEN BURT ALBERTO'S
LIST OF DEPOSITION DESIGNATIONS

Pursuant to this Court's Scheduling Order entered on August 1, 2018, Docket No. 50, the Local Rules of this Court, and Federal Rules of Civil Procedure 26, Defendant/Counterclaim Plaintiff Alden Burt Alberto offers the following list of deposition designations ("Deposition Designations"). Mr. Alberto submits these Deposition Designations without waiving any of his rights, including but not limited to, the following reservation of rights:

1. Mr. Alberto reserves the right to use any depositions designations identified by Plaintiffs/Counterclaim Defendants NorthStar Aviation L.L.C. ("NorthStar UAE") or NorthStar Aviation USA LLC ("NorthStar USA").
2. Mr. Alberto reserves the right to submit any additional deposition designations for the purposes of rebuttal and/or impeachment as may arise at trial.
3. Mr. Alberto reserves the right to amend and/or supplement his Deposition Designations to include any deposition designations identified by NorthStar UAE or NorthStar USA after submission of this Exhibit List, including without limitation, potential deposition designations cited in or relied on in discovery or motion practice by either party.

4. Mr. Alberto reserves the right to use demonstrative, illustrative and/or summary deposition designations during trial.

DEFENDANT/COUNTERCLAIM PLAINTIFF'S DEPOSITION DESIGNATIONS

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Date: February 7, 2019

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 7, 2019, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, which will send a notification of such electronic filing (NEF) to all counsel of record.

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